

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:17-cv-00454-GKF-JFJ
	)	
1) CASTLE HILL STUDIOS LLC	)	
(d/b/a CASTLE HILL GAMING);	)	
2) CASTLE HILL HOLDING LLC	)	
(d/b/a CASTLE HILL GAMING); and	)	
3) IRONWORKS DEVELOPMENT, LLC	)	
(d/b/a CASTLE HILL GAMING)	)	
	)	
Defendants.	)	

**PLAINTIFF’S NOTICE OF PROPOSED REDACTIONS TO DOCKET NO. 344**

Plaintiff Video Gaming Technologies, Inc. (“VGT”) hereby submits proposed redactions to the Court’s Opinion and Order granting in part and denying in part VGT’s Motion for Partial Summary Judgment (Dkt. No. 344) (the “Order”).

VGT requests redaction of confidential VGT information appearing in the Order, as shown in blue highlighting in Exhibit A hereto.<sup>1</sup> The redactions include quotes or paraphrasing of confidential deposition testimony of current and former VGT employees, as well as confidential documents of VGT, including information about VGT’s trade secrets at issue in this case (pp. 2, 12, 14, 16), VGT’s regulatory compliance efforts (pp. 6–7),<sup>2</sup> VGT’s confidential market research and other purported business activities (pp. 8 and 9), VGT’s agreements with customers (p. 16),

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<sup>1</sup> The Order itself contains yellow highlighting. Therefore, VGT has indicated its proposed redactions using blue highlighting.

<sup>2</sup> Magistrate Judge Jayne determined that this information was properly designated as Confidential or Highly Confidential under the Protective Order. *See* Dkt. No. 314.

and the contents of a confidential VGT document (p. 16). The redactions thus “contain ‘sources of business information that might harm [VGT’s] competitive standing.’” *Deherrera v. Decker Truck Line, Inc.*, 820 F.3d 1147, 1162 n.8 (10th Cir. 2016) (quoting *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 598 (1978)). Further, VGT has sought to limit the amount of redactions to a small amount of sensitive information, which has little, if any, bearing on the substance of the Order.

For these reasons, VGT respectfully requests that the Court maintain the Order under seal and apply VGT’s proposed redactions, as shown in Exhibit A hereto, to the public version of the Order.

August 5, 2019

Respectfully submitted,

/s/ Peter A. Swanson

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***Counsel for Video Gaming Technologies, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2019, I filed the foregoing Plaintiff's Notice of Proposed Redactions to Docket No. 344 via ECF, which caused a true and correct copy of the foregoing motion to be delivered to the following counsel:

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**Exhibit A**  
**(Filed Under Seal)**